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TWO THEORIES OF CONSIDERATION.—

DEAR MR. EDITOR,—Will you permit me to correct two errors in my article on "Consideration" printed in the last number of the *Review*. The first is a misprint. In line 19 of page 31 "think itself" should be "promise itself."

The other error, I regret to say, is not a misprint. I should like, however, to substitute for so much of the sentence as follows the word "is" in line 23 of the same page, these words: "to find the consideration in the mere act of giving the promise requested in these cases, and yet to deny the quality of consideration to the same act in other cases." Professor Williston certainly did not fall into the same fallacy which he had detected in another. It is with great regret that I find myself unable to agree with my friend and colleague as to the essence of consideration. But it is doubly painful to discover that I did him the injustice of giving an erroneous reason for my dissent from his view. I hope that this correction may meet the eyes of all who happen to read my misconceived criticism.

JAMES BARR AMES.

JURY TRIAL IN THE DISTRICT OF COLUMBIA. — According to the common law of England, no verdict of a jury could be reviewed by another jury on appeal to a superior court. This rule was adopted in the American colonies, with the exception of New England and Georgia; at all events, it governs that ideal jury which our federal Constitution guarantees. The application of this principle to the courts of the justices of the peace of the District of Columbia has recently been determined by the Supreme Court of the United States in an able and learned opinion by Mr. Justice Gray. *Capital Traction Co.* v. *Hof*, 19 Sup. Ct. Rep. 580. These courts were established by Act of Congress, which continued their existence as under the laws of Maryland. Appeal was provided to the Supreme Court of the District, before a jury if desired. In 1823 the jus-